

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
vs.) No. 17-CR-03126-01/05-S-MDH
)
CASEY B. WATKINS,)
)
) Defendant.)

MOTION FOR ORDER RETURNING DEFENDANT TO STATE CUSTODY

Comes now Defendant, Casey B. Watkins, by counsel, and moves the Court for an Order Returning him to State Custody pending sentencing in this matter.

Suggestions in Support

1. Defendant is currently on a Writ from the Missouri Department of Corrections.
2. Defendant is not receiving any credit for his time in county jail awaiting disposition of this case.
3. Defendant indicates that she could be paroled out and released from DOC if she were able to return to the custody of the State of Missouri, Missouri Department of Corrections. Defendant has already missed two parole hearings.
4. The sentencing process for Defendant is lengthy and could take up to or more than six months.
5. Returning the Defendant to the custody of the State of Missouri, Missouri Department of Corrections will not prejudice the Government in any way.
6. Allowing the Defendant to return to be paroled will help her custody status at the time of sentencing and make things easier to calculate time served credit for her.
7. Counsel for Defendant has spoken to the Assistant US Attorney assigned to the case, Josephine Stockard, and she does not have an objection to the Defendant being returned

to the Missouri Department of Corrections.

WHEREFORE, for all the foregoing reasons, Counsel for the Defendant respectfully requests that this Court enter an Order allowing Defendant to return to the custody of the State of Missouri, Missouri Department of Corrections while she waits for the sentencing process.

Respectfully submitted,

/s/ Marsha D. Jackson
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May, 2019, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Marsha D. Jackson
MARSHA D. JACKSON #50716

May 22, 2019